

MEMO ENDORSED

147 PRINCE STREET | 4TH FLOOR | BROOKLYN, NEW YORK 11201 TELEPHONE 1.718.766.5153 | FACSIMILE 1.718.504.3599 EMAIL: cbacchus@sharovalaw.com

YELENA SHAROVA, ESQ. *+
*NY, +NJ

BRUCE PROVDA ESQ.* CHARLES KASER ESQ.* NANI KIM ESQ.* CHARLES MARINO, ESQ.* STEVEN GARFINKLE, ESQ.*+

By ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 The January 13 status conference is adjourned to February 17, 2021, at 10:00 a.m. Speedy trial timeis excluded from January 13, 2021, until February 17, 2021, in the interest of justice. The parties shallcall the Court at (877) 411-9748 and use access code 3029857#. (Members of the press and public may call the same number, but will not be permitted to speak during the conference.)

SO ORDERED.

Edgardo Ramos, U.S.D.J Dated: <u>1/12/2021</u>

New York, New York

Re: United States v. Fernando Rafael Ruiz, 20 Cr. 185 (ER)

Dear Judge Ramos,

The Defendant, through Counsel, respectfully submits this letter in advance of the conference currently scheduled for January 13, 2021, at 11 am, to request a thirty (30) day adjournment of the conference to allow the Defendant to review the proposed plea agreement received by the Government on or about January 5, 2021. The Court granted the parties' prior requests for adjournments on May 22, 2020; August 5, 2020; September 22, 2020; October 22, 2020, and November 20, 2020.

The Government, specifically Jarrod L. Schaeffer, Assistant United States Attorney, consents to the requested adjournment, which will permit Defense Counsel to review said proposed agreement with the Defendant, in an effort to resolve this matter, pre-trial. For similar reasons, the Defendant requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C.§§ 3161 (h)(1)(E) and 3161 (h)(7)(A), from January 13, 2021, through the date of any newly scheduled conference. The Government likewise consents to the exclusion of time.

Respectfully Submitted,

CHARLES KASER, ESQ.

Sharova Law Firm 147 Prince Street, Fourth Floor

Brooklyn, New York 11201 (718) 766 – 8207